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JB/2019R01307

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

BOLAJI BOLARINWA and
ISIAKA BOLARINWA

Crim. No. 22-123 (JHR)

18 U.S.C. § 1589(a)

18 U.S.C. § 1589(b)

8 U.S.C. § 1324(a)(1)(A)(iii) and (B)(i)

18 U.S.C. § 1592

18 U.S.C. § 2

SUPERSEDING INDICTMENT

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CLERK, U.S. DISTRICT COURT - NJ
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The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

COUNT ONE
(Forced Labor)

Beginning in or about November 2015 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

BOLAJI BOLARINWA,

did knowingly provide and obtain the labor and services of VICTIM 1 by means of (1) serious harm and threats of serious harm to VICTIM 1 and another person; (2) abuse and threatened abuse of the law and legal process; and (3) a scheme, plan, and pattern intended to cause VICTIM 1 to believe that, if she did not perform such labor and services, she and another person would suffer serious harm; and any combination of such means.

In violation of Title 18, United States Code, Section 1589(a).

COUNT TWO
(Forced Labor)

Beginning in or about April 2016 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

BOLAJI BOLARINWA,

did knowingly provide and obtain the labor and services of VICTIM 2, by means of (1) force and threats of force to VICTIM 2 and another person; (2) serious harm and threats of serious harm to VICTIM 2 and another person; (3) abuse and threatened abuse of the law and legal process; and (4) a scheme, plan, and pattern intended to cause VICTIM 2 to believe that, if she did not perform such labor and services, she and another person would suffer serious harm; and any combination of such means.

In violation of Title 18, United States Code, Section 1589(a).

COUNT THREE
(Forced Labor)

Beginning in or about November 2015 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

ISIAKA BOLARINWA,

did knowingly benefit, financially and by receiving anything of value, from participation in a venture with his spouse BOLAJI BOLARINWA which engaged in the providing and obtaining the labor and services of VICTIM 1, knowing and recklessly disregarding that the venture provided and obtained VICTIM 1's labor by means of (1) serious harm and threats of serious harm to VICTIM 1 and another person; (2) abuse and threatened abuse of the law and legal process; and (3) a scheme, plan, and pattern intended to cause VICTIM 1 to believe that, if she did not perform such labor and services, she and another person would suffer serious harm; and any combination of such means.

In violation of Title 18, United States Code, Section 1589(b).

COUNT FOUR
(Forced Labor)

Beginning in or about April 2016 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

ISIAKA BOLARINWA,

did knowingly benefit, financially and by receiving anything of value, from participation in a venture with his spouse BOLAJI BOLARINWA which engaged in the providing and obtaining the labor and services of VICTIM 2 knowing and recklessly disregarding that the venture provided and obtained VICTIM 2's labor by means of (1) force and threats of force to VICTIM 2 and another person; (2) serious harm and threats of serious harm to VICTIM 2 and another person; (3) abuse and threatened abuse of the law and legal process; and (4) a scheme, plan, and pattern intended to cause VICTIM 2 to believe that, if she did not perform such labor and services, she and another person would suffer serious harm; and any combination of such means.

In violation of Title 18, United States Code, Section 1589(b).

COUNT FIVE
(Bringing in and Harboring Certain Aliens)

Beginning in or about November 2015 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendants,

BOLAJI BOLARINWA
and
ISIAKA BOLARINWA,

knowingly and in reckless disregard of the fact that an alien, namely VICTIM 1, had come to, entered, and remained in the United States in violation of the law, did conceal, harbor, and shield from detection such alien, attempted to do so, and aided and abetted the concealing, harboring, and shielding from detection such alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (B)(i), and Title 18, United States Code, Section 2.

COUNT SIX
(Bringing in and Harboring Certain Aliens)

Beginning in or about April 2016 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendants,

BOLAJI BOLARINWA
and
ISIAKA BOLARINWA,

knowingly and in reckless disregard of the fact that an alien, namely VICTIM 2, had come to, entered, and remained in the United States in violation of the law, did conceal, harbor, and shield from detection such alien, attempted to do so, and aided and abetted the concealing, harboring, and shielding from detection such alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (B)(i), and Title 18, United States Code, Section 2.

COUNT SEVEN

(Unlawful Conduct with Respect to Documents in Furtherance of Forced Labor)

Beginning in or about November 2015 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

BOLAJI BOLARINWA,

knowingly concealed, removed, confiscated, and possessed, the actual passport and other immigration document, namely the visa, of another individual, namely VICTIM 1, in the course of violating 18 U.S.C. § 1589 and with the intent to violate 18 U.S.C. § 1589.

In violation of Title 18, United States Code, Section 1592.

COUNT EIGHT

(Unlawful Conduct with Respect to Documents in Furtherance of Forced Labor)

Beginning in or about April 2016 and continuing through in or about October 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

BOLAJI BOLARINWA,

knowingly concealed, removed, confiscated, and possessed, the actual passport and other immigration document, namely the visa, of another individual, namely VICTIM 2, in the course of violating 18 U.S.C. § 1589 and with the intent to violate 18 U.S.C. § 1589.

In violation of Title 18, United States Code, Section 1592.

FORFEITURE ALLEGATION AS TO COUNTS ONE, TWO, THREE, FOUR,
SEVEN, AND EIGHT

The United States hereby gives notice that upon conviction of the defendants, BOLAJI BOLARINWA and ISIAKA BOLARINWA, of the offenses charged in each of respective Counts One, Two, Three, Four, Seven, and Eight of this Superseding Indictment, the United States will seek forfeiture, in accordance with 18 U.S.C. § 1594(d), of all right, title, and interest of the defendants in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offenses; and any property, real or personal, constituting or derived from any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and any property traceable to such property. The property to be forfeited includes, but is not limited to, all right, title and interest of the defendants in 2 Buttonwood Court, Moorestown, New Jersey, 08057, and any sale or other proceeds thereof.

FORFEITURE ALLEGATION AS TO COUNTS FIVE AND SIX

The United States hereby gives notice that upon conviction of the defendants, BOLAJI BOLARINWA and ISIAKA BOLARINWA, of the offenses charged in Counts Five and Six of this Superseding Indictment, the United States will seek forfeiture, in accordance with 18 U.S.C. § 982(a)(6)(A)(ii), of any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of such offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of such offenses. The property to be forfeited

includes, but is not limited to, all right, title and interest of the defendant in 2
Buttonwood Court, Moorestown, New Jersey, 08057, and any sale or other
proceeds thereof.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

If any of the above-described forfeitable property, as a result of any act or
omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as
incorporated by 18 U.S.C. § 2253, to seek forfeiture of any other property of the
defendants up to the value of the forfeitable property listed above.

A TRUE BILL

[Redacted]
FOREPERSON

Philip R. Sellinger, Jr.

PHILIP R. SELLINGER
United States Attorney
KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

CASE NUMBER: 22-123

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**BOLAJI BOLARINWA
and
ISIAKA BOLARINWA**

SUPERSEDING INDICTMENT FOR

**18 U.S.C. § 1589(a)
18 U.S.C. § 1589(b)
8 U.S.C. § 1324(a)(1)(A)(iii) and (B)(i)
18 U.S.C. § 1592
18 U.S.C. § 2**

A True Bill,


Foreperson

**PHILIP R. SELLINGER
U.S. ATTORNEY, NEWARK, NEW JERSEY**

**JEFFREY B. BENDER
ASSISTANT U.S. ATTORNEY
ELIZABETH HUTSON
CIVIL RIGHTS DIVISION TRIAL ATTORNEY
CAMDEN, NEW JERSEY
(856) 757-5026**

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